

NICHOLAS A. TRUTANICH
United States Attorney
District of Nevada
Nevada Bar No. 13644
PATRICK BURNS
Nevada Bar No. 11779
STEVEN W. MYHRE
Nevada Bar No. 9635
Assistant United States Attorneys
United States Attorney's Office, District of Nevada
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336/Fax: (702) 388- 6418
John.P.Burns@usdoj.gov
Steven.Myhre@usdoj.gov

Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LANCE K. BRADFORD,

Defendant.

Case No. 2:19-cr-00222-KJD-BNW

**STIPULATION FOR A
PROTECTIVE ORDER**

The parties, by and through the undersigned, respectfully request that the Court issue an order protecting from disclosure to the public, or any third party not directly related to this case, any documents, recordings, or other tangible things produced by the government during discovery that contain the confidential taxpayer information or personal identifying information of individuals referenced in the discovery. The parties state as follows:

1. The indictment in this case issued on August 27, 2019.

1 2. Trial is currently scheduled for November 4, 2019. Defendant's attorneys, Richard
2 Wright, Esq. and Russell Marsh, Esq., filed their notices of appearance on September 3, 2019.

3 3. The indictment in this case alleges that defendant filed numerous false tax returns
4 on behalf of individuals and entities. The discovery therefore contains extensive amounts of tax
5 payer information, including tax returns and information otherwise deemed confidential under
6 26 U.S.C. § 6103. The discovery also contains the personal identifying information, such as
7 names, social security numbers, and birthdates of numerous individuals. The release of such
8 information to the public or third parties not involved in the case could endanger the privacy of
9 numerous individuals and also subject them to potential misuse of their identities. This
10 confidential taxpayer and personal identifying information is referred to here as the "Protected
11 Information."

12 4. In order to protect the privacy of the individuals referenced in the discovery, the
13 parties intend to restrict access to the following individuals: the defendant, attorneys for all
14 parties, and any personnel that the attorneys for all parties consider necessary to assist in
15 performing that attorney's duties in the prosecution or defense of this case, including
16 investigators, paralegals, retained experts, support staff, interpreters, and any other individuals
17 specifically authorized by the Court (collectively, the "Covered Individuals").

18 5. The Covered Individuals shall be advised of and provided a copy of the Protective
19 Order, and, without leave of Court, the Covered Individuals shall not:

- 20 a. make copies for, or allow copies of any kind to be made by any other person of the
21 Protected Information in this case;
- 22 b. allow any other person to read, listen, or otherwise review the Protected
23 Information in this case;
- 24 c. use the Protected Information for any purpose other than preparing to defend

1 against or prosecute the charges in the Indictment or any further superseding
2 indictment arising out of this case; or

3 d. attach any Protected Information to any of the pleadings, briefs, or other court
4 filings except to the extent those pleadings, briefs, or filings are filed under seal or
5 properly compliant with LR IC 6-1.

6 6. Nothing in this stipulation is intended to restrict the parties' use or introduction of
7 the Protected Information as evidence at trial or as support in motion practice.

8 7. The parties shall inform any person to whom disclosure may be made pursuant to
9 this order of the existence and terms of this Court's order.

10 8. The parties reserve the right to seek to modify the terms of this protective order at
11 a later time pursuant to Federal Rule of Criminal Procedure 16(d)(1). Should a reasonable need
12 for this protective order cease to exist, on grounds other than a Covered Individual or some other
13 person violating or circumventing its terms, the government will move expeditiously for its
14 dissolution.

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1 9. The defense hereby stipulates to this protective order.

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3 Respectfully submitted,

4 For the United States:

5 NICHOLAS A. TRUTANICH
6 United States Attorney

7 _____/s/_____
8 PATRICK BURNS
9 Assistant United States Attorney

10 For the Defense:

11 _____/s/_____
12 RICHARD WRIGHT, ESQ.
13 RUSSELL MARSH, ESQ.
14 GEORGE KELESIS, ESQ.
15 Attorneys for DEFENDANT BRADFORD

16 **IT IS SO ORDERED:**

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18 _____
19 HON. BRENDA N. WEKSLER
20 UNITED STATES MAGISTRATE JUDGE

21 September 11, 2019

22 _____
23 Date
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CERTIFICATE OF SERVICE

I certify that I am an employee of the United States Attorney's Office. A copy of the foregoing **STIPULATION FOR A PROTECTIVE ORDER** was served upon all counsel of record, via the electronic case filing system.

DATED this 10th day of September, 2019.

/s/ Patrick Burns

PATRICK BURNS
Assistant United States Attorney